

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

KAREN BARKES individually; TINA)
GROSSMAN as next)
friend of BRITTANY BARKES; TINA)
GROSSMAN as next friend of ALEXANDRA)
BARKES; and KAREN BARKES as administratrix)
of the ESTATE OF CHRISTOPHER BARKES,)

Plaintiffs,)

v.)

C.A. No. 06-104(JJF)

FIRST CORRECTIONAL MEDICAL,)
INC.; STANLEY TAYLOR; RAPHAEL)
WILLIAMS; CERTAIN UNKNOWN)
INDIVIDUAL EMPLOYEES OF THE STATE OF)
DELAWARE DEPARTMENT OF)
CORRECTION; CERTAIN UNKNOWN)
INDIVIDUAL EMPLOYEES)
OF FIRST CORRECTIONAL MEDICAL,)
INC.; and STATE OF DELAWARE)
DEPARTMENT OF CORRECTION,)

Defendants.)

JURY TRIAL DEMANDED

**PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY
JUDGMENT**

Plaintiffs, through their undersigned counsel, respectfully oppose Defendants' Motion for Summary Judgment in the above-captioned case. The grounds for their opposition are set forth in Plaintiffs' Answering Brief in Opposition to Defendants' Motion for Summary Judgment, which is filed separately.

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Dated: November 13, 2007

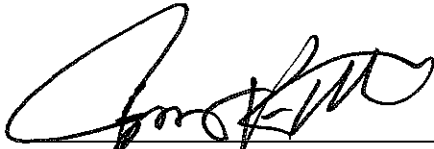
CERTIFICATE OF SERVICE

I, Jeffrey K. Martin, the undersigned counsel for Plaintiff in the above-captioned case, hereby certify that the foregoing *Plaintiff's Opposition to Defendants' Motion for Summary Judgment* was filed via CM/EMF on November 13, 2007 to the following:

Stephani J. Ballard
Department of Justice
Carvel State Office Building
820 N French St
Wilmington, DE 19801

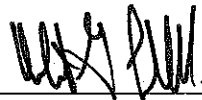
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INDIVIDUAL EMPLOYEES
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DEPARTMENT OF CORRECTION,

Defendants.

C.A. No. 06-104(JJF)

JURY TRIAL DEMANDED

ORDER

Upon consideration of the Defendants' Motion for Summary Judgment and
Plaintiffs' Opposition thereto, this _____ day of _____, 2007, it is hereby,

ORDERED, that Defendants' Motion for Summary Judgment is DENIED.

J.